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8 Attorneys for United States of America

9
10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN JOSE DIVISION

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 ADRIAN BALTAGA,
17 GHEORGHE BALTAGA,

18 Defendants.

} UNITED STATES' MOTION TO UNSEAL
} DOCUMENTS AND [PROPOSED] ORDER

UNDER SEAL

19 The government hereby moves this Court to unseal the items under the following
20 dockets:

21 CR 12-90147 MISC – HRL

22 CR 12-90268 MISC – HRL

23 CR 12-90372 MISC – PSG

24 CR 12-90373 MISC – PSG

25 CR 12-90434 MISC – HRL

26 CR 12-90503 MISC – PSG

27 CR 12-90592 MISC – HRL

FILED
JAN 27 2014
HILDEBRAND W. MEYER
CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE

CR-13-00703-LHK

1 CR 12-90593 MISC – HRL
2 CR 12-90676 MISC – NMC
3 CR 12-90712 MISC – HRL
4 CR 12-90809 MISC – PSG
5 CR 12-90809-renewal – PSG
6 CR 12-90832 MISC – HRL
7 CR 12-90832 MISC -- Extended -- PSG
8 CR 12-90834 MISC – HRL
9 CR 13-70237 – HRL
10 CR 13-70238 – HRL
11 CR 13-90108 MISC – PSG
12 CR 13-90108 MISC-extension – NMC
13 CR 13-90108 MISC-extension – HRL
14 CR 13-90108 MISC-extension – HRL
15 CR 13-90236 MISC – HRL
16 CR 13-90284 MISC – PSG
17 CR 13-90284 MISC-extension – HRL
18 CR 13-90284 MISC-extension – HRL
19 CR 13-90387 MISC – HRL
20 CR 13-90677MISC – PSG
21 CR 13-90681MISC –PSG
22 CR 13-90736 MISC –PSG

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1 The basis for this application is that the covert phase of this investigation is complete, the
2 defendants have been indicted, and the government needs to complete discovery obligations under Rule
3 16. In order to complete said obligations, the government needs to disclose the above-referenced items.
4 The materials no longer need to remain sealed to the public.

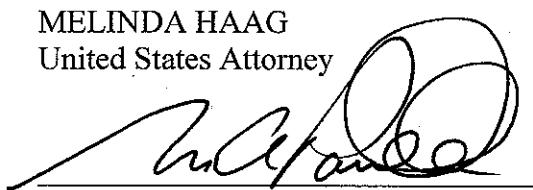
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6 DATED: January 23, 2014 Respectfully submitted,

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MELINDA HAAG
United States Attorney



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MATTHEW A. PARRELLA
Assistant United States Attorney

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1 **[PROPOSED] ORDER**
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Based upon the motion of the government and for good cause shown, IT IS HEREBY
ORDERED that the items under the following dockets, as well as this application and order, be
UNSEALED:

6 CR 12-90147 MISC – HRL

7 CR 12-90268 MISC – HRL

8 CR 12-90372 MISC – PSG

9 CR 12-90373 MISC – PSG

10 CR 12-90434 MISC – HRL

11 CR 12-90503 MISC – PSG

12 CR 12-90592 MISC – HRL

13 CR 12-90593 MISC – HRL

14 CR 12-90676 MISC – NMC

15 CR 12-90712 MISC – HRL

16 CR 12-90809 MISC – PSG

17 CR 12-90809-renewal – PSG

18 CR 12-90832 MISC – HRL

19 CR 12-90832 MISC – Extended -- PSG

20 CR 12-90834 MISC – HRL

21 CR 13-70237 – HRL

22 CR 13-70238 – HRL

23 CR 13-90108 MISC – PSG

24 CR 13-90108 MISC-extension – NMC

25 CR 13-90108 MISC-extension – HRL

26 CR 13-90108 MISC-extension – HRL

27 CR 13-90236 MISC – HRL

28 CR 13-90284 MISC – PSG

1 CR 13-90284 MISC-extension – HRL

2 CR 13-90284 MISC-extension – HRL

3 CR 13-90387 MISC – HRL

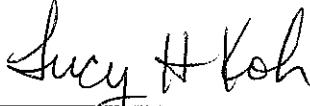
4 CR 13-90677MISC – PSG

5 CR 13-90681MISC –PSG

6 CR 13-90736 MISC –PSG

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8 IT IS SO ORDERED.

9 DATED: 1/24/14

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11 LUCY H. KOH
United States District Court Judge